

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NICOLE BROCKMOLE, LAUREN BAIR and
NICK ERCKLENTZ, on behalf of themselves
and all others similarly situated,

Plaintiffs,

- against -

EZ FESTIVALS LLC, AVANT GARDNER,
LLC, MADE EVENT LLC, CITYFOX,
REYNARD PRODUCTIONS, JURGEN
BILDSTEIN, PHILLIP WIEDERKEHR, AGDP
HOLDING INC., GARDNER PURCHASER
LLC, WIEDERKEHR ASSOCIATES,
STEWART PURCHASER LLC, WRE PARENT
US HOLDING CORP. INC., WRE
MANAGEMENT LLC, WRE HOLDING AG
and JOHN DOES NO. 1-10,

Defendants.

Civil Action No. 1:23-cv-08106-MMG

**NOTICE OF THE EZ DEFENDANTS’
MOTION TO DISMISS CERTAIN
DEFENDANTS AND COUNTS OF THE
BROCKMOLE COMPLAINT**

(Oral Argument Requested)

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of the EZ Defendants’ Motion to Dismiss Certain Defendants and Counts of the Brockmole Complaint, dated March 21, 2024, and upon all the pleadings and proceedings herein, Defendants EZ FESTIVALS, LLC, AVANT GARDNER, LLC, MADE EVENT LLC, and JURGEN BILDSTEIN (collectively, “EZ Defendants”) will move this Court, before the Honorable Margeret M. Garnett, U.S.D.J., at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, on a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Defendants AVANT GARDNER, LLC and JURGEN BILDSTEIN, as well as Counts I, II, III, IV, and VI of the Brockmole Plaintiffs’ Supplemental and Amended Class Action Complaint, in their entirety with

prejudice, on the grounds that Plaintiffs fail to state a claim upon which relief can be granted, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the EZ Defendants respectfully request oral argument with respect to this motion.

Dated: March 21, 2024
New York, New York

Respectfully submitted,

KAUFMAN DOLOWICH, LLP

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